| | MDHHS/WIC Management Evaluation | Active Record Review | Page 1 of 9 | |
|-------------------|---------------------------------|----------------------|-------------|--|
| Agency/Clinic ID: | Reviewer | Name: | Date: | |

Active Record Review Instructions-2022

The purpose of the record review is to determine whether the agency is following State WIC policy for documentation and recordkeeping and helps to identify issues regarding the quality of required documentation.

Pg.2. Active Records/Nutrition Education, etc.: Active records are clients currently eligible for WIC benefits. At each agency visited, the reviewer is to randomly select the active WIC records indicated. Use **Clients by Cert End Date Report** to randomly select client records in their current certification period of at <u>least 5 months</u> in length and have a current BVT (Benefits Valid Through) date.

Reviewing of Records

Enter client's ID number in the appropriate WIC status column. Then conduct the review of the record for each item in the column under that client's ID number entering Y (Met), N (Not Met) or N/A (Not Applicable). When all records have been reviewed, total each row and column.

Nutrition Education Contacts:

All clients must be offered nutrition education at a quarterly rate, based on their length of certification. See chart below for number of NE contacts required for length of certification period. NE offered =Missed appointments, Planned NE Method is wichealth.org or NE Mall, refused, or NE received. [WIC Fed Regs. 7 CFR Part 246, Section 246.11, (e), (2), (3)], MI-WIC Policy 5.02)

| # Required Nutrition Ed. Contacts: All Women, Infants, Children | 10-12 month cert period-4 NE | 7-9 Months-3 NE | 4-6 months -2 NE | 1-3 months -1 NE |
|---|------------------------------|-----------------|------------------|------------------|
|---|------------------------------|-----------------|------------------|------------------|

Problems and Citations

- Indicate the total number of errors or N's for each item. Cite if 2 or more errors per item line, unless noted. Note any review items or record which had a substantial number of errors or Not Mets. Additional files may need to be reviewed if problems are noted.
- 3. Ineligible/Short Cert: From WIC Ineligible and Expiring Short Cert reports, choose 5 records each that have been processed in the last year.
- **4. Role Report/Credentials/Training:** Review Role reports to ensure all staff assigned meets required credentials and training. Review 20% of randomly selected staff (minimum of 5) if training requirements are met. Review 2 staff for certificates/documentation.
- **5. Formula Approval**: From Formula Usage Report, choose the records from each formula category I (child over 1), II, & III suggest choosing different food packages if possible. Verify that Class III clients are offered High Risk services.
- 6. HR Ind Care Plan: Select 5 records from different categories that have current Individual Care Plans to review for Care Plan documentation.
- **7. High Risk Review**: From High Risk Report choose 10 high risk clients from a variety of WIC categories to determine if high risk clients are being offered RD services. Review each record. Note any pattern of declining High Risk Services.
- 7. WIC Dual Participation Report: Review from previous 2, 4, 8, & 12 months ago. Review for prompt resolution and follow up (within 45 days).
- 8. Certification Timeframes: Review next available appointments for High Priority (10 d) and all others (20 d), NCRD (30 d), and ISD Referrals.
- **8. Compliance**: Review Client Compliance Log for past 12 months to determine if agency is adequately monitoring compliance and within timeframe.
- **9. Breast pump Monitoring:** Review Overdue Breast pump report (select up to 10 records) and review for monthly follow-up. Client List by Pump Model Issued Report (up to 12 records in each category, different pump models, and issued by different staff) for signed Releases, returned Receipts, and client contact requirements.

| | MDHHS/WIC Management Evaluation | | | | ACTIVE IX | ecora R | eview | | Client II | | e 2 o i 9 | | | | | |
|-------|--|-----|-----|----------|------------|----------|------------|-----|-----------|-----|------------------|-----|-----|-----|-----|--------------|
| | | | | | | | | | | | | | | | | |
| Code: | Y= Yes N = No/Error NA=Not Applicable | | | | | | | | | | | | | | | Total Errors |
| MPR | Nutrition Education/Referrals/Breastfeeding/Food Pkg | Р | Р | BE BP | IBE IBP | BE BP | IBE IBP | NPP | IFF | NPP | IFF | C1 | C2 | C3 | C4 | |
| | Record current length of client's certification period (mos.) | | | | | | | | | | | | | | | |
| 5.3b | 30-day extension applied? Note if routine | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | Number of contacts required for cert period? (# noted for full certification period) (Policy 5.02) | 1/4 | 1/4 | 1/4 | 1/4 | 1/4 | 1/4 | 1/4 | 1/4 | 1/4 | 1/4 | 1/4 | 1/4 | 1/4 | 1/4 | |
| | Number of contacts offered (NE received, refused or missed appts, wichealth.org or NE Mall in NE Method)? | | | | | | | | | | | | | | | |
| 6.1a | Did the clinic offer the required number of contacts? | | | | | | | | | | | | | | | |
| 6.2d | Planned NE Method documented? Cert, Recert, Evals | | | | | | | | | | | | | | | |
| 6.2c | NE content documented? | | | | | | | | | | | | | | | |
| 6.2b | Previous NE reviewed at recert/evals? F/U Date/initials/eval | | | | | | | | | | | | | | | |
| 6.2d | NE Plan provided? | | | | | | | | | | | | | | | |
| 5.1a | Client without insurance referred to Medicaid? | | | | | | | | | | | | | | | |
| 51b | Other referrals documented, if applicable? (MIHP/Healthy Start, NFP/home visit program for I/PG, if available) | | | | | | | | | | | | | | | |
| 6.5d | PG client referred to PC services contacted during the prenatal period? (MI-WIC Policy 4.02) | | | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | |
| 6.5d | Client contacted by PC or BF staff within 1-2 business days after notification of a baby's birth? (MI-WIC policy 4.02) | | | | | | | | NA | | NA | NA | NA | NA | NA | |
| 6.5d | Client referred for BF assistance receive follow-up within 1-2 business days? (MI-WIC Policy 4.02) | | | | | | | | NA | | NA | NA | NA | NA | NA | |
| 8.1a | Food pkg issued does not exceed 3 complete months. | | | | | | | | | | | | | | | |
| 10.1b | Are staff ID on income tab and cert complete different or records scanned? | | | | | | | | | | | | | | | |
| 5.3d | Infant/Child offered/received Evaluations for current cert? | NA | NA | NA | | NA | | NA | | NA | | | | | | |
| 7.2a | Food package assigned is appropriate for the client category and/or breastfeeding status (dyad)? C-1 Notes/C-2-4 & Pg Risk Code | | | | | | | | | | | | | | | |
| 7.2b | Appropriate formula amt. issued for current BF? | | | | | | | | | | | | | | | |
| | Notes: | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | 1 | 1 | |

| Ineligible/Short Certs Documentation Record Review | Client's Identification Number | | | Review WIC Ineligible Report from last 12 months | | | | | |
|--|-----------------------------------|----------|-------------|---|--|--|--|--|--|
| Ineligibles Documentation (MI-WIC Policy 2.20) | | | | Total errors | Review client record: Client/Miscellane Communications to determine if docum | | | | |
| *Written Notice of Ineligibility given Reason stated | | | | | *Ineligible at recertificatio Fair Hearing automaticall | not on report reviewed. at initial certification or tion-issuance of written notice and ing is required. Fair Hearing prints ally with Ineligibility notice. Only bility Notice is written to the | | | |
| Valid reason for ineligibility based on record? | | | | | - | | | | |
| 5.4c Did agency provide requesons? | uired not | ificatio | ons for val | id | YES | If 2 or more, cite Action Plan needed | | | |

| | Cli | | Identi umbe | fication r | | | | | |
|--|-------|-------|----------------|---------------|-----------------|---|--|--|--|
| | | | | | Rev | • | ing Short Certs Report last 12 months | | |
| Short Certs Documentation (MI-WIC Policy 2.17, 2.20) | | | | | Total errors | 5 short ce Review cli Client/Mise | wer should randomly select ert records for review. ent record: cellaneous/Communications | | |
| #Written notice of Short Cert Given | | | | | | to determine if document printed if not on report reviewed. | | | |
| Reason stated | | | | | | | t at current certification- of written notice of short cert | | |
| Was the short cert for a valid reason? (i.e., unable to verify using available tools- if no, provide consultation) | | | | | | is required | | | |
| 4.2d Did agency provide req short certification reasons? | uired | notif | icatio | ons for v | alid | YES | If 2 or more, cite Action Plan needed | | |

| | | Review Roles and verify staff crede t on Roles Report, if so, retain listi | | ning for | ALL | |
|-----|---|---|------------------------|--------------|----------------|--|
| MPF | R 3.1 LA Staffing | Name | Credentials/ Degree | Met? | | |
| | | | _ | Υ | N | |
| С | WIC Coordinator* | | | * | | |
| | Breastfeeding Coordinator* | | | * | | |
| | Breastfeeding PC Manager | | | | | |
| | Lactation Consultant- IBCLC** | | | | | |
| | Nutrition Ed. Coordinator | | | | | |
| | tion credentials effective 2/25/1 LC requirement as of 10/1/17 | 4, MI-WIC Policy 1.07. Does not apply to sta | aff in position prior | to this date |) . | |
| а | Do all CPA staff meet cr | edential/degree requirements? | | | | |
| b | Do all RD staff meet cree | dential requirements? | | | | |
| i | Are all staff trainings doo | cumented on a log equivalent to 1.07 | A ? | | | |
| i | | quired trainings within required timefr (Review 20% of staffmin. 5 staff) | ames? | | | |
| | # Staff completed all trai | nings ÷ Total # staff reviewed | = | | | |
| | | % (cite ≤85%) nutrition and breastfeeding edu 4X/yo | ear | | | |
| i | Review 2 staff certificate training log? | s/documents. Are records complete | and reflect | | | |
| | | | | 1 | 1 | |

Comments:

Food Package/ Formula Approval Record Review

7.3 a- Review at least 8-client records total (including some of each group designated below) and verify that the agency is following WIC Policy for formula/food package approval and documentation.

Use the Formula Usage Report to identify clients on All Class I (excluding infants), II & III formulas.

| Formula/ type Class I – | Client ID# | Medical Doc. Scanned Y N | Medical Doc. Complete | Qualifying Condition (QC) meets requirement | QC included in risk assessment if known at time of cert/eval* | Food Package reflects Med. Doc. Rx Y N | Expire Date appropriate for Rx. | Notes | : |
|---|--|-----------------------------------|-------------------------------|---|---|---|--------------------------------------|-----------------------|--------|
| C1-C4 Class I - | | YN | YN | YN | YN | YN | YN | | |
| C1-C4 Class II | | ΥN | ΥN | ΥN | ΥN | ΥN | ΥN | | |
| | | | YN | | | | | | |
| Class II | | YN | Y IN | YN | Y N | YN | Y N | | |
| Class II | | ΥN | ΥN | ΥN | ΥN | ΥN | ΥN | | |
| Class II | | ΥN | YN | Y N | Y N | ΥN | ΥN | | |
| Total Citations | | | | | | | | | |
| Formula type | Client ID# | Medical Doc. Scanned | Medical Doc. Complete | Qualifying Condition (QC) meets requirement | QC included in risk assessment if known at time of cert/eval* | Food Package reflects Med. Doc. Rx. | Expire Date appropriate for Rx | **High Risk/ NCRD? | Notes: |
| Class III | | ΥN | ΥN | ΥN | ΥN | ΥN | ΥN | ΥN | |
| Class III | | ΥN | ΥN | ΥN | ΥN | ΥN | ΥN | ΥN | |
| Class III | | ΥN | ΥN | ΥN | ΥN | ΥN | ΥN | ΥN | |
| Class III | | ΥN | ΥN | ΥN | ΥN | ΥN | ΥN | ΥN | |
| Class III | | ΥN | ΥN | ΥN | ΥN | ΥN | ΥN | ΥN | |
| Class III | | ΥN | ΥN | ΥN | ΥN | ΥN | ΥN | ΥN | |
| Total Citations | | | | | | | | | |
| Food Packa | ge/Formula Approv | al Record F | Review | Cite if 2 or mo | ore per column | Yes | | ite, need n Plan | |
| | ne agency accurately with special dietary n | | | | s I, II, III) for | | | | |
| the last cert, change in me 7.03) | all known qualifying recert, IEVAL or CE edical condition that | VAL, or any requires a C | appointment lass III formu | when appropiula)? (WIC Po | riate (e.g., a licy 2.13, | | | | |
| 6.6 a- ** Are a | all Class III records o | lesignated a | s high risk? | (MIWIC Polic | y 5.06) | | | | |
| Comment | s/Notos: | | | | | | _ | | |

Comments/Notes:

Select five (5) high risk clients from the High Risk Report who have recent individual care plans (ICP) in their records.

| | ion records. | | | | | | п | |
|------|--|----|----|----|----|----|--------------------|-----------------------|
| | Client ID# | | | | | | | |
| MPR | High Risk Individual Care Plan (ICP) (MI-WIC 5.06) | #1 | #2 | #3 | #4 | #5 | Total # of No's | Action Plan Needed |
| 6.6c | 1 CPA documents in Problem List tab | | | | | | | |
| 6.6b | 2 Individual care plan (ICP) in record or RD documents "Care Plan Not Needed" and rationale in Assessment | | | | | | | |
| 6.6b | ³ ICP includes: | | | | | | | |
| | Assessment- Client concerns/nutrition issues documented. May also include subjective/ objective data, key info, readiness for change, etc. | | | | | | | |
| | InterventionIdentified behavior change/goal(s) determined by client & RD - NE documented: Date, Topic, Method, Behavior Change/goal -Notes may include desired outcomes, additional goals, handouts provided, etc. | | | | | | | |
| | Monitoring/EvaluationNext appt type -Indicator to monitor client's progress toward goal -Follow-up info related to care plan to support continuity of care | | | | | | | |
| 6.6b | 4 Care Plan frozen? (Within 48 hours after creation) | | | | | | | |
| | Follow-up Documentation for Individual Care Plan | | | | | | | |
| 6.6e | ⁵ CPA documents relevant follow up info in Follow-up tab at next visit | | | | | | | |
| | Closure of Individual Care Plan | | 1 | | 1 | 1 | | |
| 6.6b | 6 RD closes ICP and documents rationale when goals are met or no longer applicable | | | | | | | |
| | Total Errors | | | | | | | |

High Risk Record Review (MI-WIC Policy 5.06)

| | Ingirit | JK KOOOK | L Keview (iv | | | ervices | Notes: | | | |
|--|-------------|--------------|----------------|------------|----------|---------|--------------|--|--|--|
| | | | | | | red? | | | | |
| | | | | | | ne are | | | | |
| | Non-WIC | RD | NCRD | Current | chec | ked* | | | | |
| Client ID | RD* | Declined* | Scheduled* | CP* | Υ | N | | | | |
| PG | | | | | | | | | | |
| PG | | | | | | | | | | |
| BE | | | | | | | | | | |
| BP | | | | | | | | | | |
| NPP | | | | | | | | | | |
| NPP | | | | | | | | | | |
| IBE/P | | | | | | | | | | |
| IFF | | | | | | | | | | |
| С | | | | | | | | | | |
| С | | | | | | | | | | |
| TOTAL | | | | | | | | | | |
| MPR 6.6a | Were hig | h risk clier | nts offered R | D services | s? | | | | | |
| | Cite if 2 c | or more red | cords indicat | e NO for h | HR Serv | ices Of | fered in | | | |
| Y N | current c | ert | | | | | | | | |
| | ➤ No | ote any ma | ijor pattern c | of RD Decl | ined for | High R | isk Services | | | |
| ➤ Note any major pattern of RD Declined for High Risk Services | | | | | | | | | | |

Comments:

| Dual Particip | 2 | 4 | 8 | 12 | | |
|---------------|--|-----|-------|-----|------|--------------|
| | WIC/WIC | Pre | vious | Mor | iths | Tot. Records |
| | # clients listed on WIC/WIC dual participation report | | | | | |
| | # of clients unresolved after 45 days | | | | | % unresolved |
| MPR 5.5a | Does the agency resolve Dual enrollment in a timely manner? (Cite if 20% or more unresolved) | | Ye | es | | Cite if No |

| | Certification Timeframes MIWIC Policy 3.01 | Yes | If No, Action Plan Required |
|------|--|-----|--------------------------------------|
| 5.2a | Are appointments available for new clients within the required time frames? | | |
| | Pregnant, Breastfeeding Woman, Infant, Homeless, Migrant (High Priority-10 days) | | |
| | Today's Date: Next Appt: | | |
| | Child, Non-Lactating Woman, Transfer | | |
| | (MI-WIC Policy 3.04) (All others-20 days) | | |
| | Today's Date: Next Appt: | | |
| 3.1h | Does the agency have NCRD appointments available within 30 days at each site? (MI-WIC Policy 5.06) | | |
| 5.2a | Are ISD (Integrated Service Delivery) Referrals contacted or | | |
| | attempted within 2 business days? (review | | |
| | clinic/scheduler/Incoming Referral Work Queue for New Referrals) | | |
| 5.2a | Are clients on the ISD Referral Work Queue scheduled within the required timeframes for category? | | |

| | | Compliance Report F | Review MI-WIC | Policy 9.01 | | | | |
|-----------|-----------|---|---------------|-------------------------------------|-----------------|-------|--|--|
| | | ompliance Log: Review Agency Client Coreports/Participation/Client Compliance Log). | | vestigations for | past 12 month | ns: | | |
| _ | | all complaints | | Complaints | % of Complaints | | | |
| а | To | tal complaints logged | | | | | | |
| b | Со | mplaints pending less than 4 months | | | b/a | | | |
| С | Со | mplaints completed | | | c/a | | | |
| d | Со | mplaints pending more than 4 months | | | d/a | | | |
| е | Со | mplaints with no investigation or follow-up | | | e/a | | | |
| | Ex | amine 4 records for completion | | y complete the t resolution as r | | YN | | |
| MF 10. | PR 1 a | Does the agency record, investigate and complete compliance reports in a timely manner? (Cite if more than 20% of complaints logged were pending more than 4 months or had no investigation/follow-up.) | Yes | N/A | Cite | if No | | |

| Breast Pump Monitoring Reports | | | | | | | | | | |
|--|--|--------------------------------|------------|--|--|--|--|--|--|--|
| Overdue Breast of listings. (MI-WIC F (Clinic/Reports/Breast | # of Pumps | b/a=% of pumps monitored | | | | | | | | |
| а | Number of pumps due? | | | | | | | | | |
| b | Follow-up documented? (monthly follow-ups) | | | | | | | | | |
| | le the exercise manifesting part due numana? | Υ | Cite if No | | | | | | | |
| MPR 9.1a | Is the agency monitoring past due pumps? (cite if more than 20% with no follow-up) | | | | | | | | | |

| | Client List by Pump Model Issued Report: (select 1 year back from today's date) | | | | | | | | Notes: | |
|---|---|---------|---------------|---------|----|--------|----|--|----------|----------------------------|
| (MI-WIC Policy 4.02, 4.05, 4.06, 4.07) (Clinic/Reports/Breastpump/Client List by Pump Model Issued) | | | | | | | | | | |
| Review up to 12 pumps or 20% of the total category. | | | | | | | | | | |
| Multiuser Pump | | | Contact 2 day | | | Releas | е | Return Receipt | | |
| | Client Number | Pum | Name | Υ | N | Υ | N | Υ | N | |
| 1 | | | | | | | | | | |
| 2 | | | | | | | | | | |
| 3 | | | | | | | | | | |
| 4 | | | | | | | | | | _ |
| 5 | | | | | | | | | | |
| 6 | | | | | | | | | | _ |
| 7 | | | | | | | | | | |
| 8 | | | | | | | | | | _ |
| 9 10 | | | | | | | | | | Total with No |
| 11 | | | | | | | | | | Receipt/ |
| 12 | | | | | | | | | | Total # Multiuser |
| 12 | | Su | btotal | | | | | | | pumps reviewed |
| | | X 100 = | | | | | | | | |
| Sin | gle User Pump | | | ct 2 da | ys | Releas | se | Are pump | | |
| | Client Number | Pum | o Name | Υ | N | Υ | N | returned with a | | % (Cita if 200/ an |
| 1 | | | | | | | | Receipt? |) | (Cite if 20% or more pumps |
| 2 | | | | | | | | Y | N | returned without |
| 3 | | | | | | | | ╡ | | Receipt.) |
| 4 | | | | | | | | _ | | |
| 5 6 | | | | | | | | 4 | | |
| 7 | | | | | | | | Are pumps issued with a Release ? | | Total with No |
| 8 | | | | | | | | with a Ne | ilease : | Release/ Total # Pumps |
| 9 | | | | | | | | Y | N | reviewed x 100= |
| 10 | | | | | | | | | | |
| 11 | | | | | | | | MPR 9.1a Cite if No | | <u></u> % |
| 12 | | | | | | | | Cite ii No | J | (Cite if 20% or |
| 6.5d Client Contact in 2 | | | | | | | | more pumps issued without | | |
| business days? Y N Total | | | | | | | | Release.) | | |
| | | | | | | | | | | |
| Reviewed By: Date: | | | | | | | | | | |
| Consultant: Date: | | | | | | | | | | |